## SECRET

# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI SOUTHWESTERN DIVISION

UNITED STATES OF AMERICA.

Plaintiff,

v.

(**01**) **WILLIAM D. JOHNSON**, [DOB: 12-06-1974],

(**02**) **DOUGLAS S. WARD**, [DOB: 06-28-1988],

(**03**) **JOSHUA T. DAVENPORT** [DOB: 03-17-1981],

and

(**04**) **RITA M. GLASGOW**, [DOB: 01-11-1990],

Defendants.

## **Defendants/Counts:**

(01) Johnson: 1, 2, and FA (02) Ward: 1 and FA

(03) Davenport: 1, 4, 5, and FA (04) Glasgow: 1, 3, 6, and FA

No. 21-5003-01/04-CR-SW-MDH

## COUNT 1

21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 846 NLT 10 Years Imprisonment NMT Life Imprisonment NMT \$10,000,000 Fine NLT 5 Years Supervised Release Class A Felony

## **COUNTS 2 and 3**

21 U.S.C. § 841(a)(1) and (b)(1)(B) NLT 5 Years Imprisonment NMT 40 Years Imprisonment NMT \$5,000,000 Fine NLT 4 Years Supervised Release Class B Felony

#### COUNT 4

21 U.S.C. § 841(a)(1) and (b)(1)(A) NLT 10 Years Imprisonment NMT Life Imprisonment NMT \$10 Million Fine NLT 5 Years Supervised Release Class A Felony

## COUNT 5

18 U.S.C. § 924(c)(1)(A) NLT 5 Years Imprisonment (Consecutive to All Counts) NMT Life Imprisonment NMT \$250,000 Fine NMT 5 Years Supervised Release Class A Felony

## COUNT 6

21 U.S.C. § 841(a)(1) and (b)(1)(C) NMT 20 Years Imprisonment NMT \$1 Million Fine NLT 3 Years Supervised Release Class C Felony

## FORFEITURE ALLEGATION

21 U.S.C. § 853

\$100 Special Assessment (Each Count)

## **INDICTMENT**

## THE GRAND JURY CHARGES THAT:

## COUNT 1

(Conspiracy to Distribute 50 Grams or More of Methamphetamine (Actual)) 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 846

Beginning on an unknown date, but at least as early as May 20, 2019, and continuing to on or about September 28, 2019, said dates being approximate, in Newton and Greene Counties, in the Western District of Missouri, and elsewhere, the defendants, WILLIAM D. JOHNSON, DOUGLAS S. WARD, JOSHUA T. DAVENPORT, and RITA M. GLASGOW, knowingly and intentionally conspired and agreed with each other and with others, known and unknown to the Grand Jury, to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

## **COUNT 2**

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance Containing a Detectable Amount of Methamphetamine) 21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about June 12, 2019, in Newton County, in the Western District of Missouri, the defendant, **WILLIAM D. JOHNSON**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

#### COUNT 3

(Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance Containing a Detectable Amount of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(B)

On or about July 2, 2019, in Newton County, in the Western District of Missouri, the defendant, **RITA M. GLASGOW**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

## **COUNT 4**

(Possession with Intent to Distribute 50 Grams or More of Methamphetamine (Actual)) 21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about September 6, 2019, in Greene County, in the Western District of Missouri, the defendant, **JOSHUA T. DAVENPORT**, knowingly and intentionally possessed, with intent to distribute, 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

## **COUNT 5**

(Possession of Firearm in Furtherance of Drug Trafficking Crime)

18 U.S.C. § 924(c)(1)(A)

On or about September 6, 2019, in Greene County, in the Western District of Missouri, the defendant, **JOSHUA T. DAVENPORT**, did knowingly possess a firearm, to wit, a Beretta, Model Nano, 9mm pistol, bearing serial number NU63569, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute 50 grams or more of methamphetamine (actual), as alleged in Count 1, and possession with intent to distribute 50 grams or more of methamphetamine (actual), as alleged in Count 4, in violation of Title 18, United States Code, Section 924(c)(1)(A).

#### COUNT 6

(Possession with Intent to Distribute a Mixture or Substance Containing a Detectable Amount of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about September 28, 2019, in Newton County, in the Western District of Missouri, the defendant, **RITA M. GLASGOW**, knowingly and intentionally possessed, with intent to distribute, any amount of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

## FORFEITURE ALLEGATION

The allegations contained in Count 1 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count 1 of this Indictment, WILLIAM D. JOHNSON, DOUGLAS S. WARD, JOSHUA T. DAVENPORT, and RITA M. GLASGOW, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to, a forfeiture money judgment representing proceeds the defendants personally obtained, directly and indirectly, as a result of their participation in the drug conspiracy alleged in Count 1.

## SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

## A TRUE BILL

/s/ Kevin Elliott

FOREPERSON OF THE GRAND JURY

/s/ Jessica Sarff

**JESSICA R. SARFF** 

Assistant United States Attorney

DATED: 01/19/2021

Springfield, Missouri